

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

| | | |
|--------------------------------------|---|---------------------------|
| GABRIELA NIEVES, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | No. 1:20-cv-00320-JMS-DML |
| |) | |
| CARMEL CLAY SCHOOLS, <i>et al.</i> , |) | |
| |) | |
| Defendants. |) | |

MOTION FOR TELEPHONIC DISCOVERY CONFERENCE

Comes now Plaintiff Gabriela Nieves, by counsel, and respectfully moves the Court for a telephonic conference with Magistrate Judge Debra McVicker Lynch to discuss a discovery matter, to wit Defendant Carmel Clay Schools' assertion of privilege on documents in their possession from the Carmel Swim Club, an entity that the Carmel Clay Schools claims is separate from themselves.

Plaintiff has tried, unsuccessfully, through numerous telephone calls and emails, to resolve this matter without court intervention.

Counsel for Defendant Carmel Clay Schools has been contacted regarding this Motion and objects to the relief requested herein.

WHEREFORE, Gabriela Nieves, by counsel, respectfully requests that a telephonic conference be scheduled with Magistrate Judge Debra McVicker Lynch in January 2021 to assist the parties in resolving their differences concerning the assertion of privilege by Carmel Clay Schools, and for all other relief just and proper in the premises.

Respectfully submitted,

s/ Jonathan Little

Jonathan Little, jon@slawfirm.com

SAEED & LITTLE, LLP

133 W. Market St., #189

Indianapolis, IN 46204

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I certify that the foregoing document was filed on January 13, 2021 using the Court's CM/ECF system. Service will be made on all ECF-registered counsel of record by operation of the same.

s/ Jonathan Little

Jonathan Little